

Plaintiff's Name CARRON T
 CDCR No. WB1153
 Address CCWP
P. O. BOX 1508
CHOWCHILLA, CA 93610

FILED

Mar 29, 2022

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

IN THE UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF CALIFORNIA

1:22-cv-00363-BAM-(PC)

(Name of Plaintiff)

(Case Number)

VS.

CDCR,CCWP WARDEN,JOHN DOE(S) 1-50,ET - AL

CIVIL RIGHTS COMPLAINT UNDER:

 42 U.S.C. 1983 (State Prisoner)

(Names of all Defendants)

I. Previous Lawsuits (list all other previous or pending lawsuits on additional page):

A. Have you brought any other lawsuits while a prisoner? Yes No _____B. If your answer to A is yes, how many? 3

Describe previous or pending lawsuits in the space below. (If more than one, attach additional page to continue outlining all lawsuits in same format.)

1. Parties to this previous lawsuit:

Plaintiff CARRONDefendants JO DOE(S), ET - AL2. Court (if Federal Court, give name of District; if State Court, give name of County)
SOUTHERN DISTRICT3. Docket Number 3:20-cv-000794. Assigned Judge BERMUDEZ

EXHIBIT "A"

SETTLED6. Filing Date (approx.) UNKNOWN7. Disposition Date (approx.) UNKNOWN

II. Exhaustion of Administrative Remedies

NOTICE: Pursuant to the Prison Litigation Reform Act of 1995, A[n]o action shall be brought with respect to prison conditions under [42 U.S.C. * 1983], or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted. 42 U.S.C. * 1997e(a). Prior to filing suit, inmates are required to exhaust the available administrative remedy process, Jones v. Bock, 549 U.S. 199, 211, 127 S.Ct. 910, 918-19 (2007); McKinney v. Carey, 311 F.3d 1198, 1999 (9th Cir. 2002), and neither futility nor the unavailability of money damages will excuse the failure to exhaust, Porter v. Nussle, 534 U.S. 516, 524, 122 S.Ct. 983, 988 (2002). If the court determines that an inmate failed to exhaust prior to filing suit, the unexhausted claims will be dismissed, without prejudice. Jones, 549 U.S. at 223-24, 127 S.Ct. at 925-26.

A. Is there an inmate appeal or administrative remedy process available at your institution?

Yes No _____

B. Have you filed an appeal or grievance concerning ALL of the facts contained in this complaint?

Yes No _____

C. Is the process completed?

Yes

If your answer is yes, briefly explain what happened at each level.

I EXHAUSTED ADMINISTRATIVE REMEDIES. THERE WAS
NO ACTUAL RELIEF AS CCWR WANTS TO COVER THIS
UP.

No _____

If your answer is no, explain why not.

CARROLL, T. #WB1153

CCWF, 505-23

P. O. BOX 1508

CHOWCHILLA, CA 93610

U.S. DISTRICT COURT

CARROLL, T.,

CASE NO.

MITCHELL, G.,

PETITION FOR PRELIMINARY

WILLIAMS, L.

INJUNCTIVE RELIEF, TEMPORARY

CLASS PLAINTIFF(S)

RESTRANING ORDER, APPOINTMENT

CDCR, CCWF WARDEN,

OF COUNSEL, CIVIL/HUMAN

JOHN DOE(S) 1-50,

RIGHTS VIOLATIONS U.S. 1983

ET. AL

DEFENDANT(S)

03/27/22, 1200 HRS.

PLAINTIFF(S) CARROLL, MITCHELL AND WILLIAMS ARE ADA
(PERMANENT WHEELCHAIR BOUND) INMATE/PATIENTS IN CCWP
CDCR MENTAL HEALTH DELIVERY SYSTEM AT CCCMS
LEVEL OF CARE HOUSED IN A MEDICAL UNIT (505) ON
FACILITY B. CARROLL IS A SB132 PERSON HOUSED AT CCWP
PER COURT ORDER/RESTRANING ORDER VIA ARMSTRONG
V. NEWSOM. IN DISCRIMINATION FOR CARROLL BEING SB132,
HEARING/MOBILITY/VISION IMPAIRED AND IN RETALIATION
FOR REPORTING BEING THE VICTIM OF EMPLOYEE SEXUAL

MISCONDUCT, HIGHLIGHTING RAMPANT EMPLOYEE SEXUAL MISCONDUCT AT CCWP (WHICH CCWP STAFF CALL "ONE OF THE GREATEST PERKS OF THE JOB"), FOR SUCCESSFULLY SETTLING A LAWSUIT IN CARROLL v. C. TOELE WHERE RJD STAFF LEFT CARROLL HANDCUFFED IN A WHEEL-CHAIR FOR (3) DAYS, BEING DEAD DECLARANT THAT LEAD TO RJD AND (S) OTHER PRISONS HAVING TO WEAR BODY-CAMS AND ALSO BEING INSTRUMENTAL IN CCWP STAFF HAVING TO WEAR BODY-CAMS IN JUNE (SEE: ARMSTRONG V. NEWSOME), STAFF HAVE CONTINUED TO ATTACK CARROLL WITH FALSIFIED RVR'S TO PREVENT PAROLE SUITABILITY (CARROLL IS NON-VIOLENT / NON-SERIOUS 3RD STRIKER WHOSE TWO PRIOR STRIKES ARE FROM A SINGLE JUVENILE CONVICTION), AND HAVE ORDERED, EMPLOYED, THREATEN OTHER INMATES TO PHYSICALLY, VERBALLY AND SOCIALLY ATTACK CARROLL. 'M J. DOE PHYSICALLY ATTACKED CARROLL MULTIPLE TIMES IN DECEMBER 2021, ON CAMERA, ON ORDER FROM CCWF STAFF AND DIDN'T RECEIVE ANY DISCIPLINARY ACTIONS ALTHOUGH CDCR POLICY INDICATES THAT BEHAVIOR WARRANTS AD-SEG PLACEMENT. 'M J. DOE YELLED HOMOPHOBIC SLURS MAKING THESE HATE CRIMES. ALTHOUGH CARROLL ASKED FOR AD-SEG PLACEMENT TO BE SAFE FROM 'M J. DOE, IT WAS DENIED. 'M J. DOE LATER ASSAULTED CARROLL ON 03/03/22 AND BRAGGED THAT STAFF ORDERED IT. CDCR AND ITS

EMPLOYEES KNEW OR SHOULD HAVE KNOWN 'IM J. JOE WOULD ATTACK PLAINTIFF CARROLL AGAIN. HOWEVER, THE STAFF AT CCWF DONT WANT SB132 PEOPLE AT CCWF FOR FEAR THAT THE WOMEN (INMATES) THAT THEY'RE ALLOWED TO TAKE ADVANTAGE OF WOULD BE ATTRACTED TO THE SB132 PEOPLE. 'IM MITCHELL, WHO'S A FAMILY MEMBER OF CARROLL, WAS PHYSICALLY ATTACKED BY 'IM J. JOE AFTER THE INITIAL TWO TIMES THAT 'IM J. JOE ATTACKED CARROLL. 'IM WILLIAMS WAS VERBALLY ATTACKED BY 'IM J. JOE AFTER THE INITIAL TWO TIMES THAT 'IM J. JOE ATTACKED CARROLL. BOTH 'IM MITCHELL AND 'IM WILLIAMS WERE ATTACKED AND ROBBED BY 'IM J. JOE FOR THEIR ASSOCIATION WITH CARROLL. 'IM WILLIAMS SUFFERED A HEART ATTACK AS A RESULT. BOTH 'IM MITCHELL AND 'IM WILLIAMS ARE OVER (65) YEARS OLD, WHEELCHAIR BOUND. THESE ATTACKS WERE ELDERLY ABUSE, ADA ABUSE.

THE HATE CRIMES, ADA ABUSE, ELDERLY ABUSE ENCOURAGED, EMPLOYED, CONDONED, COVERED UP, ETC BY CCWP STAFF AMOUNTS TO CRUEL AND UNUSUAL PUNISHMENT, RECKLESS ENDANGERMENT, DELIBERATE INDIFFERENCE, FAILURE TO PROTECT, FAILURE TO RESPOND, FAILURE TO SUPERVISE, VIOLATIONS OF THE TORTURE AND GENEVA CONVENTIONS,

CIVIL RIGHTS, ETC

CDCR, CCWP WARDEN, CCWP EMPLOYEES JOHN DOE(S)
I-SO, IN THEIR INDIVIDUAL AND PROFESSIONAL
CAPACITY(S) VIOLATED THE CIVIL RIGHTS OF PLAINTIFF(S)
CARROLL, MITCHELL AND WILLIAMS.

THE PLAINTIFFS NEED APPOINTMENT OF COUNSEL
TO OBTAIN DOCUMENTS, VIDEO FOOTAGE, WITNESSES,
ETC THAT CCWP HAS CIRCUMVENTION MEASURES
IN PLACE FOR AND A GREEN WALL/BUDGY SYSTEM
TO BLOCK ACCESS TO LEGAL RIGHTS.

THE PLAINTIFF(S) SEEK MONETARY DAMAGES FROM
ALL DEFENDANTS IN THE AMOUNTS A JURY
WANTS TO HOLD THEM ACCOUNTABLE FOR.

I DECLARE THE ABOVE IS TRUE AND CORRECT.

 (IN PRO-SE)
03/27/22

ESTEEMED GREETINGS -

I WAS A PROUD STUDENT OF YOUR COLLEGE FROM APPROXIMATELY (11 - 11), AT WHICH TIME I EARNED UNITS TOWARDS MY DEGREE. UNFORTUNATELY I'VE SINCE LANDED IN PRISON. FORTUNATELY IM ABLE TO CONTINUE MY EDUCATION WHILE HERE.

THE PROBLEM IS, I NEED ACCURATE/OFFICIAL TRANSCRIPTS FROM YOU OUTLINING THE COURSE(S) I TOOK FROM YOU, ALONG WITH THE DATES AND UNITS EARNED. IF YOU COULD PLEASE FORWARD THOSE TRANSCRIPTS TO ME AT YOUR EARLIEST CONVENIENCE IT WOULD BE GREATLY APPRECIATED.

SHOULD THERE BE A FEE OR ANY QUESTIONS, YOU CAN CONTACT MY CONTACT PERSON BELOW AND/OR CONTACT ME DIRECTLY AT THE ADDRESS BELOW.
THANK YOU FOR YOUR TIME AND CONSIDERATION.

RESPECTFULLY

(SIGN)

(MY SIGNATURE IS RELEASE OF INFO CONSENT)

(DATE)

(D.O.B.)

(S.S.N.)

CONTACT PERSON

PHONE #

List each defendant's full name, official position, and place of employment and address in the spaces below. If you need additional space please provide the same information for any additional defendants on separate sheet of paper.

A. Name JOHN JOE 1-50 is employed as CCWP STAFF
Current Address/Place of Employment UNKNOWN

B. Name _____ is employed as _____
Current Address/Place of Employment _____

C. Name _____ is employed as _____
Current Address/Place of Employment _____

D. Name _____ is employed as _____
Current Address/Place of Employment _____

E. Name _____ is employed as _____
Current Address/Place of Employment _____

IV. Causes of Action (You may attach additional pages alleging other causes of action and the facts supporting them if necessary. Must be in same format outlined below.)

Claim 1: The following civil right has been violated (e.g. right to medical care, access to courts, due process, free speech, freedom of religion, freedom from cruel and unusual punishment, etc.):

PLEASE SEE ATTACHED, EXHIBIT "A"

Supporting Facts (Include all facts you consider important to Claim 1. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, *by name*, did to violate the right alleged in Claim 1.):

PLEASE SEE ATTACHED, EXHIBIT "A"

Claim 2: The following civil right has been violated (e.g. right to medical care, access to courts, due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.):

Supporting Facts (Include all facts you consider important to Claim 2. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, *by name*, did to violate the right alleged in Claim 2.):

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

GRANT JURY TIME AND/OR MONETARILY HOLD EACH
DEFENDANT MONETARILY ACCOUNTABLE

I declare under penalty of perjury that the foregoing is true and correct.

Date: 03/28/22

Signature of Plaintiff:



(Revised 4/4/14)